

# **EXHIBIT A**

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**EXHIBIT A****CARPENTER'S EQUITABLE ALLOCATION OF REMEDIATION COSTS\***

<b><u>SETTLED PARTIES</u></b>	<b><u>WASTE TYPE</u></b>	<b><u>BULK/DRUM</u></b>	<b><u>VOLUME</u></b>	
Techalloy	Waste Oil/Pickle Liquor	Drums	229,067	229,067
Flexible	Etchant	Bulk/Drum	158,104	158,104
Etched Circuits	Etchant	Drum	68,271	68,271
Plymouth Tube Company	Pickle Liquor	Bulk	33,401	33,401
Knoll International, Inc.			36,250	36,250
Novartis	Nitric Acid	Bulk	53,800	53,800
U.S. Navy	Waste	Drums	2,390	2,390
Bostik	Nitric Acid	Bulk	9,000	9,000
Simon Wrecking	Sulphuric Nitrate	Bulk	3,025	3,025
Quickline	Etchant	Drums	2,788	2,786
Ashland /AETC	Nitric Acid	Bulk	555,655	555,655
Diaz Chemical Corporation	Nitric Acid	Bulk	173,100	173,100
Unisys	Etchant	Drums	3,465	3,465
Rohm and Haas			0	0
Thomas and Betts			0	0
Handy & Harman	TCE & Spent Acid	Drum & Bulk	8158	8158
NRM	Pickle Liquor	Bulk	650,475	650,475

**PLAINTIFFS**

Ford	Plastics/Finishing Mat	Drums	38,940	38,940
Cytec	Ammonia	Bulk	193,000	193,000
SPS	Chromic Acid	Drums	71,437	71,437
	Cyanide Waste			
	Degreasers			
	Acetone			
	Nickle Waste			

<b><u>CARPENTER**</u></b>	Pickle Liquor	Bulk	<u>122,500</u>	<u>140,000</u>
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<b>TOTAL VOLUME OF WASTE</b>	2,412,826	2,430,324
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<b>CARPENTER'S PERCENTAGE OF TOTAL VOLUME*</b>	5%	6%
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<b>TOTAL PAST REMEDIATION COSTS</b>	\$14,333,769.52
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<b>CARPENTER'S PERCENTAGE OF TOTAL PAST REMEDIATION COSTS</b>	\$716,688.48	\$860,026.17
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**\*Source: Plaintiffs' Answers to Defendants Joint Contention Interrogatories, C-28; Supplemental Stipulation of Counsel, J-34; Stipulations of Handy & Harman and Plaintiffs, P-329.**

**\*\*Carpenter's total volume is based upon whether the Court finds the testimony of Manfred DeRewal, Jr. and Bruce DeRewal tying Carpenter's waste to Boarhead Farms to be credible.**